

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

Able Electropolishing Company Inc.
2001 S Kilbourn Avenue
Chicago, IL 60623

ATTENTION:

Don Esser
Facility Manager
done@ableelectropolishing.com

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency is requiring Able Electropolishing Company, Inc. (Able Electropolishing or you) to submit certain information about the facility at 2001 S. Kilbourn Avenue in Chicago, Illinois. Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit. You must send this information to us within 60 calendar days after you receive this request.

We are issuing this information request under Section 114(a) of the Clean Air Act (the CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Enforcement and Compliance Assurance Division, Region 5.

Able Electropolishing owns and operates an emission source at the Chicago, Illinois facility. We are requesting this information to determine whether your emission source is complying with the CAA.

At this time, EPA Region 5 is not accepting any hard-copy document deliveries. If possible, we ask Able Electropolishing to upload all required information to the secured web-link shared with you at the time you received this request. If you did not receive a web-link, or if you are having technical difficulties, you must contact Karina Kuc at kuc.karina@epa.gov or 312-353-5090 to make arrangements to submit your response.

Able Electropolishing must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1519.

You may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice.

This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 et seq., because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

We may use any information submitted in response to this request in an administrative, civil or criminal action.

Failure to comply fully with this information request may subject Able Electropolishing to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Karina Kuc at 312-353-5090.

Michael D. Harris
Division Director
Enforcement and Compliance Assurance
Division

Appendix A

When providing the information requested in Appendix B, use the following instructions and definitions.

Instructions

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.
2. Precede each answer with the number of the question to which it corresponds and, at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

Electronic Submissions

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for “image over text” to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

3. Provide submission to the secure web-link provided by EPA.
4. Provide a table of contents of all electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. We recommend the use of electronic file folders organized by question number.
5. Please submit documents claimed as confidential business information (CBI) in separate file folders apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

Definitions

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.*, or National Emission Standards for Hazardous Air Pollutants for Secondary Aluminum Production 40 C.F.R. Part 63, Subpart T.

1. The terms “document” and “documents” shall mean any object that records, stores, or presents information, and includes writings, memoranda, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy, including any form or format of these. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by EPA, with all necessary documentation and support.
2. “Emissions testing” includes but is not limited to compliance testing, engineering testing, and testing for general information.
3. “Facility” means the facility at 2001 S Kilbourn Avenue in Chicago, Illinois.
4. “Nonpoint source” means area sources, volume sources, polygon sources, line sources, and buoyant line sources.
5. “Point source” means vertical stacks, horizontal stacks and capped stacks source types.
6. “Pollutants of Concern” means trichloroethylene, hexavalent chromium (Cr6) and trivalent chromium (Cr3).
7. “You” and “Able Electropolishing” means Able Electropolishing Company Inc.

Appendix B

Information You Are Required to Submit to EPA

Able Electropolishing must submit the following information pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a):

Provide the following information for the following Pollutants of Concern: trichloroethylene (TCE), hexavalent chromium (Cr6), and trivalent chromium (Cr3).

1. Information about the Facility:
 - a. A diagram of the facility with scale;
 - b. Geographic coordinates (Universal Transverse Mercator (UTM)) coordinate or latitude and longitude): property boundaries and each building corner and coordinates of all corners of each tier of any multi-leveled (tiered) building. Specify the datum used (e.g., NAD83, NAD27, WGS84, etc.);
 - c. Building dimensions for all buildings located on the facility property: length, width, and height (specify units), as well as the dimensions for each tier of any multi-leveled (tiered) buildings;
 - d. Location of any fencing or other barriers of the facility used to keep public away from the facility and the locations of nearby residents;
 - e. Location of loading dock doors; and
 - f. Identify the electropolishing stations and indicate whether they are fully enclosed and whether emissions are vented to the atmosphere.
2. A list of all of the most current emission sources that emit Pollutants of Concern at the facility, broken down as follows:
 - a. For all point sources (stacks), provide the following (specify units):
 - i. Stack height;
 - ii. Stack inside diameter;
 - iii. Stack effluent temperature;
 - iv. Stack exit velocity (identify if stack is obstructed (e.g., rain cap) or has a horizontal or downward release); and
 - v. Geographic coordinates (UTM coordinate or latitude and longitude) of each stack. Specify the datum used (e.g., NAD83, NAD27, WGS84, etc.).

- b. For all nonpoint sources, including but not limited to fugitives, vents, outlets, dust piles, degreasers, solvent recovery units, and TCE storage tank(s), specify each source and provide the following:
 - i. Dimensions of the degreaser room: length, width, and height (specify units);
 - ii. Dimensions of the opening to the degreaser room: height and width;
 - iii. Dimensions of all loading dock doors: height and width of the opening and height from the ground;
 - iv. A physical and process description of the source;
 - v. A photograph of the source; and
 - vi. Geographic coordinates (UTM coordinates or latitude and longitude) of each corner of a non-point (fugitive) source. Specify the datum used (e.g., NAD83, NAD27, WGS84, etc.).
3. In an unlocked Excel spreadsheet, provide emission rates of TCE, Cr6 and Cr3 in pounds per hour (lb/hr) and tons per year (tpy) emitted from each point (stack) and non-point (fugitive) source for the past 5 years (January 1, 2017 – December 31, 2021).
4. Identify where TCE emissions are being evacuated from the building to the atmosphere, including but not limited to fans, vents, doors, and dock doors.
5. A description of methods used to determine amount and type of emissions, including emission factors used.
 - a. Specify if emissions are vapor or particulates;
 - b. Specify hours of operation; and
 - c. Specify frequency with which emissions rates are determined (continuously, monthly, etc.).
6. If modeling has previously been conducted for the facility, include the following information:
 - a. Input and output files for all modeling software (including pre- and post-processors). Please include software version number;
 - b. Meteorological data used, including years and station location for all surface data (1-minute and hourly, if applicable) and upper air data; and
 - c. Modeling report or text file describing the modeling methodology and input data.
7. Provide all emissions testing conducted for the electropolishing units.

8. From January 2018 to the present, provide in an Excel-compatible spreadsheet the records of TCE usage (lb/mo), TCE waste (lb/mo), and percent TCE in waste (taken monthly) for each solvent cleaning machine.
9. Explain how the room draft in the degreasing room is measured as required by 40 CFR 63.466(d). Include the model of the instrument used.